

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: : Case No. 17-14928-elf
Donnell B. Simon : Chapter 13
Debtor

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**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

New Penn Financial, LLC d/b/a Shellpoint Mortgage Servicing has filed a motion for approval of Loan Modification with this COURT.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before December 24, 2018 you or your attorney must do **all** of the following:

- (a) file an answer explaining your position at:
U.S. Bankruptcy Court
Eastern District of PA
Bankruptcy Clerk of Courts
900 Market Street, #400
Philadelphia, PA 19107

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's Attorney:
Lorraine Gazzara Doyle, Esquire
Pincus Law Group, PLLC
425 RXR Plaza
Uniondale, NY 11556
516-699-8902 PHONE
516-279-6990 FAX

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on January 15, 2019 at 1:00 p.m., United States Bankruptcy Court, Eastern District of Pennsylvania. Unless the court orders otherwise, the hearing on this contested matter will be an

evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

By: /s/ Lorraine Gazzara Doyle
Lorraine Gazzara Doyle, Esquire
Pincus Law Group, PLLC
Attorney for Movant
425 RXR Plaza
Uniondale, NY 115556

Date: December 10, 2018

cc:

Debtor

Donnell B. Simon
227 Baily Road
Yeadon, PA 19050
Via U.S. Mail

Debtor's Attorney

TIMOTHY ZEARFOSS
Law Office of Timothy Zearfoss
143-145 Long Lane
Upper Darby, PA 190 82
Via CM/ECF

Trustee

WILLI AM C. MILLER, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105
Via CM/ECF

U.S. Trustee

United States Trustee
Office of the U.S. Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107
Via CM/ECF